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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHAN JAMES EVANOVICH,
JONATHAN CURL, and
ANDREA CARTER

Defendants.

CASE NO. 2:24-CR-0079-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: November 7, 2024

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on November 7, 2024.
2. By this stipulation, defendants now move to continue the status conference until January 23, 2025, at 9:30 a.m., and to exclude time between November 7, 2024, and January 23, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced more than 14,000 pages of discovery consisting of investigative reports, financial documentation, phone extractions, photographs, and other documentary evidence, in addition to emails, audio and video recordings, and inventories. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1 b) As of the last court filing, the government has continued its investigation,
2 resulting in the execution of an additional arrest warrant, corresponding additional discovery, and
3 the receipt of additional grand jury subpoena returns, all of which have been produced to the
4 defense. Over 390 pages of new discovery were produced to the defense. In addition, over 200
5 pages of discovery that were still processing at the time of the last court filing have since been
6 fully processed and provided to the defense.

7 c) Since the last court filing, Defendant Andrea Carter was arrested in connection
8 with this case. Her counsel has been provided with the government's discovery in the case,
9 consisting of over 14,000 pages.

10 d) Counsel for defendants Evanovich, Curl, and Carter desire additional time to
11 review discovery, research the charges and potential defenses, conduct independent
12 investigation, and consult with their clients.

13 e) Counsel for defendants believe that failure to grant the above-requested
14 continuance would deny them the reasonable time necessary for effective preparation, taking into
15 account the exercise of due diligence.

16 f) The government does not object to the continuance.

17 g) Based on the above-stated findings, the ends of justice served by continuing the
18 case as requested outweigh the interest of the public and the defendant in a trial within the
19 original date prescribed by the Speedy Trial Act.

20 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
21 et seq., within which trial must commence, the time period of November 7, 2024 to January 23,
22 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
23 T4] because it results from a continuance granted by the Court at defendant's request on the basis
24 of the Court's finding that the ends of justice served by taking such action outweigh the best
25 interest of the public and the defendant in a speedy trial.

26 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
27 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
28 must commence.

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IT IS SO STIPULATED.

Dated: November 4, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JESSICA DELANEY
JESSICA DELANEY
Assistant United States Attorney

Dated: November 4, 2024

/s/ CHRISTINA SINHA
CHRISTINA SINHA
Counsel for Defendant
Stephan James Evanovich

Dated: November 4, 2024

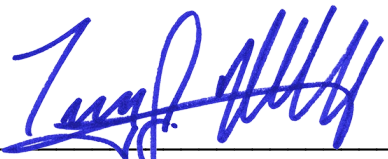
/s/ KELLAN PATTERSON
KELLAN PATTERSON
Counsel for Defendant
Jonathan Curl

Dated: November 4, 2024

/s/ CHRIS COSCA
CHRIS COSCA
Counsel for Defendant
Andrea Carter

ORDER

IT IS SO FOUND AND ORDERED this 4th day of November, 2024.



Troy L. Nunley
Chief United States District Judge